

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

JUSTIN MICHAEL WOLFE,

Petitioner,

v.

CIVIL CASE 1:22-CV-700

HAROLD W. CLARKE, DIRECTOR,
VIRGINIA DEPARTMENT OF
CORRECTIONS,

Respondent.

MOTION FOR LEAVE TO AMEND PETITION FOR HABEAS RELIEF

Petitioner Justin Wolfe, by counsel, requests leave of court to amend his Petition for Habeas Relief pursuant to Fed. R. Civ. P. 15(a), for the reasons stated in the memorandum of law filed contemporaneously with this motion.

WHEREFORE, the Petitioner prays that this Motion for Leave to Amend be granted.

Dated: April 28, 2023

Respectfully submitted,

/s/ Scott M. Abeles

Scott M. Abeles*

Eugene J. Rossi, Va Bar No. 93136

CARLTON FIELDS, P.A.

Suite 400 West

1025 Thomas Jefferson Street, NW

Washington, DC 20007-5208

Telephone: (202) 965-8189

Facsimile: (202) 965-8100

sabeles@carltonfields.com

grossi@carltonfields.com

*admitted *Pro Hac Vice*

Attorneys for Petitioner, Justin Michael Wolfe

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of April, 2023, I electronically filed the foregoing document with the Clerk by using the CM/ECF system, which will send a notice of electronic filing to all registered users of the CM/ECF system.

/s/Eugene J. Rossi
Attorney